

UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA

In re:

JOHN P. WITHEREL & CARLA WITHEREL	:	Case No: 11-22158-JAD
	:	
Debtors	:	Chapter 13
	:	
JOHN P. WITHEREL & CARLA WITHEREL	:	Document No.
Debtors/Movants	:	
	:	Related to Claim No. 10
v.	:	
	:	
MIDFIRST BANK, A FEDERALLY CHARTERED SAVINGS ASSOCIATION	:	
and Ronda J. Winnecour, Trustee	:	
Respondents	:	

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE AND  
CHAPTER 13 PLAN FEASIBILITY**

The undersigned hereby declares that the Debtor was instructed to take over direct mortgage payments beginning in June 2016.

Therefore, no amended Plan is necessary and/or objection to the notice is required.

July 29, 2016

/s/ Edgardo D. Santillan  
Edgardo D. Santillan, Esquire  
PA ID No. 60030  
SANTILLAN LAW FIRM, P.C.  
775 Fourth St.  
Beaver, PA 15009  
724-770-1040  
[Eds@debtlaw.com](mailto:Eds@debtlaw.com)

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Respondents	:	

**CERTIFICATION OF SERVICE**

I, Edgardo D. Santillan Esquire of SANTILLAN LAW FIRM, P.C., 650 Corporation Street, Suite 304, Beaver, PA 15009 certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 29th day of July 2016, **I SERVED A COPY OF THE WITHIN DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE AND CHAPTER 13 PLAN FEASIBILITY UPON THE FOLLOWING:**

Ronda J. Winnecur Chapter 13 Trustee Suite 3250, USX Tower 600 Grant Street <b>Via ECF Noticing</b>	U.S. Trustee 1001 Liberty Avenue Liberty Center Suite 970 Pittsburgh, PA 15222 <b>Via ECF Noticing</b>
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Joshua Goldman, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
**Via ECF Noticing**

I certify under penalty of perjury that the foregoing is true and correct.  
EXECUTED ON July 29, 2016

/s/ Edgardo D. Santillan  
Edgardo D. Santillan, Esquire  
PA ID No. 60030  
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